

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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FIVE STAR BANK,

*Plaintiff,*

KATHERINE MOTT; ROBERT HARRIS; KRM  
EVENTS, LLC; KATHERINE'S ON MONROE, LLC;  
THE DIVINITY ESTATE AND CHAPEL, LLC; KNC  
ELEGANCE, LLC D/B/A THE WINTERGARDEN BY  
MONROES; 11 WEXFORD GLEN, LLC; RCC  
MONROES LLC; NAF REMODELING LLC;  
MONROES AT RIDGEMONT LLC CRESCENT  
BEACH AT THE LAKE LLC; MOTT MANAGEMENT  
LLC; KRISTINA BOURNE; TAYLOR PAGANO;  
TIMOTHY LAROCCA,

*Defendants.*

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CASE NO. 6:24-CV-06153-FPG

**NOTICE OF MOTION FOR  
APPROVAL OF SECOND  
APPLICATION OF  
RECEIVER, MARK R.  
KERCHER, FOR ALLOWANCE  
OF COMPENSATION AND  
REIMBURSEMENT OF  
EXPENSES**

PLEASE TAKE NOTICE that, pursuant to this Court's Order Appointing Receiver Over Defendant Entities (ECF Dkt. No. 39) entered by this Court on April 8, 2024, Court-appointed Receiver Mark R. Kercher (the "Receiver"), by and through Harter Secrest & Emery LLP, hereby moves this Court for an Order approving his Second Application for Allowance of Compensation and Reimbursement of Expenses, covering the period from May 1, 2024 to May 31, 2024.

In light of the circumstances set forth in the accompanying application, the Receiver respectfully requests that the Court's consideration and determination of this request be performed as expeditiously as possible and without the need for formal motion practice. But should motion practice or an appearance or argument be required, the Receiver will make himself available at the Court's convenience at a return date set by the Court.

In support of this motion, the Receiver submits his own application, dated July 1, 2024, annexed hereto.

**Dated:** July 2, 2024

Respectfully submitted,

HARTER SECRET & EMERY LLP

By:



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